

# **EXHIBIT B**

**UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS**

**IN RE NEW ENGLAND COMPOUNDING )  
PHARMACY, INC. PRODUCTS )  
LIABILITY LITIGATION )**

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**THIS DOCUMENT RELATES TO:**

**All Suits Against the Saint Thomas Entities**

**MDL No. 2419  
Dkt. No 1:13-md-2419 (RWZ)**

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**Notice to Ameridose of 30(b)(6) Deposition**

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Defendants, Saint Thomas West Hospital f/k/a St. Thomas Hospital; Saint Thomas Health; and Saint Thomas Network (collectively the “Saint Thomas Entities”), pursuant to Federal Rule of Civil Procedure 30(b)(6), come now and give notice that the oral and videotaped deposition of Ameridose, LLC (“Ameridose”), as an organization, will be taken on the topics detailed below. Ameridose shall identify the person(s) who will speak on its behalf on each topic at least seven (7) days before the deposition(s).

The deposition will be taken on June 11, 2015, beginning at 9:00 a.m. (EDT) and continuing until completed. The deposition will take place at the offices of Nutter, McClennon & Fish LLP, Seaport West, 155 Seaport Blvd., Boston, Massachusetts 02210. The deposition will be recorded by stenographical means and by video.

Pursuant to Federal Rule of Civil Procedure 30(b)(6), Ameridose’s designee(s) shall be prepared to testify regarding the following subjects:

1. The business relationship between Ameridose, NECC, MSM, Alaunus and any other affiliated or related company<sup>1</sup>, including all documents reflecting the terms, conditions and scope of such relationship;
2. Identification of the owners, executives, employees, managers, and other representatives of Ameridose, including job titles and descriptions;
3. Ameridose's organizational structure and any organizational charts, including the chain of command and decision making authority;;
4. Ameridose's policies and procedures for compounding and/or manufacturing pharmaceuticals, including without limitation pharmaceuticals requiring a sterile clean room;
5. Ameridose's regulatory history, including without limitation the information contained in the Congressional report "FDA'S OVERSIGHT OF NECC AND AMERIDOSE: A HISTORY OF MISSED OPPORTUNITIES?," available at <http://docs.house.gov/meetings/IF/IF02/20130416/100668/HHRG-113-IF02-20130416-SD101.pdf>;
6. Communications to customers and prospective customers regarding NECC or Ameridose and the products offered by them, including without limitation the ordering process, the submission of customer lists, regulatory requirements, and the source, basis and approval of any representations or marketing materials;

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<sup>1</sup> These include:

1. Ameridose
2. Medical Sales Management
3. Medical Sales Management, SW
4. 203 Flanders Road, LLC
5. 205 Flanders Road, LLC
6. Alanus Pharmaceuticals
7. AMD
8. Cadden Family- 2012, LLC
9. Cardo Properties, LLC
10. Conigliaro Block, Inc.
11. Conigliaro Family Investments, LLC
12. Conigliaro Industries, Inc.
13. GDC Holdings, Inc.
14. GDC Properties Management, LLC
15. Hunter Holdings, LLC
16. L&S Creations, Inc.
17. MSM, Inc.
18. MSM SW, Inc.
19. Nationwide Foam, Inc.
20. Nationwide Recycling Sales Management, Inc.
21. Physicians Choice Medical Marketing, LLC
22. Stone House Realty Group, LLC.

7. Communications with St. Thomas Hospital, Saint Thomas Health, Saint Thomas Network, Howell Allen Clinic, Dr. John Culclasure, Debra Schamberg and/or the Saint Thomas Outpatient Neurosurgical Center;
8. Communications with NECC, MSM or any other affiliated or related company regarding the ordering process for compounded product, the need for prescriptions, the labeling of drugs, the submission of patient lists, the allocation of doses to patients, the creation of prescriptions onsite at the NECC facility, and the safety of drugs compounded by NECC or Ameridose;
9. Marketing efforts to sell NECC and Ameridose products, including plans for future growth.
10. Complaints regarding the quality of NECC or Ameridose product or the veracity of MSM's marketing materials, including complaints by employees, former employees, customer and former customers;
11. The design, construction, maintenance and cleaning of the clean rooms at the NECC facility, including your communications with Liberty, Victory and UniFirst regarding same and the installation and use of only a portion of the pass-through (with conveyor belt) designed by Liberty;
12. The circumstances by which NECC began using clean rooms previously used by Ameridose and any information provided, or representations made, to NECC in connection with same;
13. The revenue generated from NECC and Ameridose product from 2008 to 2012; and
14. Ameridose's responses to the Saint Thomas Entities' discovery requests, including without limitation the documents produced in response;
15. Information known or available to Ameridose regarding the circumstances of the contamination of MPA at the NECC Facility, the outbreak of fungal meningitis across several states, and the closing of NECC and Ameridose; and
16. Documents produced by any party on the US Legal repository involving any Ameridose representative or employee.

Respectfully submitted,

/s/ Adam T. Schramek

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**CERTIFICATE OF SERVICE**

I certify that unless noted otherwise below, the foregoing was served by electronic mail on the 28<sup>th</sup> day of April, 2015.

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